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February 19, 2025

VIA ECF

The Honorable Christina A. Bryan
United States District Court
for the Southern District of Texas
515 Rusk Street, Room 7007
Houston, TX 77002

Re: *In re Anadarko Petroleum Corp. Sec. Litig.*, No. 4:20-cv-00576 (S.D. Tex.)

Dear Judge Bryan:

We write on behalf of the parties to the above-referenced action with respect to the upcoming hearing on February 21, 2025 concerning Defendants' challenges to producing documents under the District Court's March 31, 2023 motion to compel Order (ECF 226-8). Pursuant to the procedure discussed at the February 10, 2025 hearing, the parties have selected the following categories of documents for discussion at the February 21 hearing:

- Category 1: Emails regarding Legal Advice (Mullins' Log Nos. 1-4, 12-13, 18). An excerpted privilege log containing just these entries is attached hereto as Exhibit A.
- Category 16: Witness Interview Memoranda (Defendants' Log Nos. 578, 591, 606, 615, 621, 623, 626, 632, 634-36, 641, 643, 645, 647-50, 652, 654-55, 659-60, 662, 670, 673, 688-94, 696, 705, 713, 715, 719, 724-25, 740-41, 776, 816-17, 837-38, 857-58, 860, 862, 864, 883, 887, 891-99, 901, 908, 913). An excerpted privilege log containing just these entries is attached hereto as Exhibit B.
- Category 7: Emails regarding SEC Investigation (Defendants' Log No. 331). An excerpted privilege log containing this entry is attached hereto as Exhibit C.
- Category 15: Anadarko Culture and Conduct Memorandum (Defendants' Log No. 695). An excerpted privilege log containing just this entry is attached hereto as Exhibit D.



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- Category 8: Norton Rose Information Requests (Defendants' Log Nos. 210, 215-16, 226-37, 269, 328). An excerpted privilege log containing just these entries is attached hereto as Exhibit E.
- Category 13: Draft SEC Presentations (Defendants' Log Nos. 747-48, 750, 763, 765, 770, 777-78, 871-74, 876). An excerpted privilege log containing just these entries is attached hereto as Exhibit F.

The parties' arguments pertaining specifically to these categories of documents can be found at the following:

Defendants:

- Emails regarding legal advice: ECF 233 at 6; ECF 236 at 4, 5 (separation of fact from opinion argument).
- Witness interview memoranda: ECF 233 at 10; ECF 236 at 5 (separation of fact from opinion argument).
- Emails regarding SEC investigation: ECF 233 at 7; ECF 236 at 4, 5 (separation of fact from opinion argument).
- Anadarko Culture and Conduct Memorandum: ECF 233 at 9-10; ECF 236 at 5 (separation of fact from opinion argument).
- Norton Rose information requests: ECF 233 at 7-8; ECF 236 at 5 (separation of fact from opinion argument).
- Draft SEC presentations: ECF 233 at 9; ECF 236 at 5 (separation of fact from opinion argument).

Plaintiffs:

- Emails regarding legal advice: ECF 235 at 10.
- Witness interview memoranda: ECF 235 at 7; ECF 238 at 4-5 (fairness and completeness argument with respect to SEC presentation).
- Emails regarding SEC investigation: ECF 235 at 8; ECF 238 at 5.

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- Anadarko Culture and Conduct Memorandum: ECF 235 at 8; ECF 238 at 4-5 (fairness and completeness argument with respect to SEC presentation).
- Norton Rose information requests: ECF 235 at 8-9.
- Draft SEC presentations: ECF 235 at 7-8.

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP

CRAVATH, SWAINE
& MOORE LLP

s/ Hillary B. Stakem
HILLARY B. STAKEM

s/ Lauren Rosenberg
LAUREN ROSENBERG

Encls.

cc: All Counsel (via ECF, w/ encls.)